

**From:** Linda A. Olsen [mailto:Linda.Olsen@concordiaplans.org]  
**Sent:** Friday, May 08, 2009 10:05 AM  
**To:** EBSA, E-OHPSCA - EBSA  
**Subject:** Mental Health Parity Act

In response to your request for comments or questions regarding issues under the Paul Wellstone and Pete Domenici Mental Health Parity and Addiction Equity Act of 2008, our organization would appreciate further clarification about how hospital preadmission certification programs are affected.

In our medical benefits, we currently require hospital preadmission certification for non-network admissions only, otherwise a \$500 penalty is assessed against the benefits.

In our mental health and substance abuse benefits, we currently require hospital preadmission certification for network and non-network admissions, and no benefits are paid for unapproved care.

Is complete parity required in this area also?

Linda A. Olsen  
Vice President, Plan Administration  
Concordia Plan Services  
The Lutheran Church--Missouri Synod  
1333 South Kirkwood Road  
St. Louis, MO 63122-7295  
Phone: 314-885-6710  
Fax: 314-885-6760  
Email: Linda.Olsen@ConcordiaPlans.org